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Attorneys for  
TIGER NATURAL GAS, INC.

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re	)	CASE NO. 19-30089 (DM)
	)	
PACIFIC GAS AND ELECTRIC	)	Chapter 11
COMPANY,	)	
	)	
-and-	)	<b>DECLARATION OF LEAH E.</b>
	)	<b>CAPRITTA IN SUPPORT OF</b>
	)	<b>TIGER NATURAL GAS, INC.'S</b>
PACIFIC GAS AND ELECTRIC	)	<b>MOTION TO FILE REDACTED</b>
COMPANY,	)	<b>PLEADINGS AND MOTION SEAL</b>
	)	<b>TIGER'S MOTION TO ENFORCE</b>
Debtors.	)	<b>SETTLEMENT AND SUPPORTING</b>
	)	<b>MATERIALS</b>

☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric  
Company  
☐ Affects both Debtors

Date: April 11, 2023  
Time: 10:00 AM  
Judge: Hon. Dennis Montali  
Cttrm: 17

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

**DECLARATION OF LEAH E. CAPRITTA**

I, Leah E. Capritta, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters stated herein. I am an attorney licensed to practice in the State of Colorado and admitted pro hac vice to practice before this Court. I am a partner at the law firm of Holland & Knight LLP and am counsel for Tiger Natural Gas, Inc. ("Tiger"). I make this declaration in support of Tiger's Motion to Seal the Motion to Enforce Settlement. I have personal knowledge of the facts set forth below, and if called and sworn as a witness, I could and would testify competently thereto.

2. On January 25, 2023, the Tiger filed a Motion to Enforce Settlement [Docket No. 13451] (the "Motion") together with the Declaration of Leah E. Capritta in Support of Motion and accompanying Exhibits A-F [Docket No. 13451-1]. The Motion asked the Court to enforce the settlement with Debtor Pacific Gas & Electric Company (the "Utility") further to a stipulation on the record before the District Court.

3. On or about February 1, 2023, PG&E Corporation and Pacific Gas & Electric Company (collectively, the "Debtors") conferred with Tiger regarding a potential resolution of the Motion and, on February 3, 2023, Tiger filed a Notice of Continued Hearing, rescheduling the hearing on the Motion to April 11, 2023 [Docket No. 13488]. The parties soon thereafter agreed to a form of settlement, which includes a confidentiality provision.

4. On or about February 2, 2023, the Utility's counsel requested that Tiger move to seal the Motion, and Tiger agreed to do so. On February 7, 2023, counsel sent me those portions of the Motion and accompanying materials that the Utility wanted sealed, as follows:

- Motion, p. 3, lines 1-7, 11-12, 17-23 (settlement communications and terms);
- Motion, p. 4, lines 4-26 (settlement communications);
- Motion, p. 6, lines 19-20 (settlement terms);
- Motion, p. 7, lines 5-24 (settlement communications and terms);
- Motion, p. 8, lines 7-16, 21 (settlement communications and terms);
- Declaration, p. 2, line 25 through ECF p. 3, line 26 (settlement terms and communications);
- Declaration, p. 4, lines 5-23 (settlement communications);
- Exhibit B - All (settlement communications);
- Exhibit C - All (UET settlement agreement);
- Exhibit D, p. 4, line 16 through p. 5, line 10 (settlement terms);

- Exhibit E - All (settlement communications);
- Exhibit F - All (draft settlement agreement).

5. Exhibit 1 to this Declaration, accordingly, contains the Motion to Enforce Settlement (Redacted). Exhibit 2 to this Declaration contains the Declaration of Leah E. Capritta in Support of the Motion to Enforce (Redacted) together with redacted versions of the various exhibits.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: February 10, 2023

**HOLLAND & KNIGHT LLP**

By: /s/ Leah E. Capritta  
Leah E. Capritta  
*Attorneys for Tiger Natural Gas, Inc.*